

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
UNITED STATES OF AMERICA :
 : INDICTMENT
- v. - :
 : 20 Cr.
LAURELL WELLS, and :
GEORGIA WARD, :
 :
Defendants. :
- - - - - X

20 CRIM 633

COUNT ONE
(Conspiracy to Commit Wire and Bank Fraud)

1. From at least in or about 2017 up to and including in or about 2020, in the Southern District of New York and elsewhere, LAURELL WELLS and GEORGIA WARD, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343, and bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that LAURELL WELLS and GEORGIA WARD, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses,

representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

3. It was further a part and an object of the conspiracy that LAURELL WELLS and GEORGIA WARD, the defendants, and others known and unknown, willfully and knowingly, would and did execute and attempt to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Aggravated Identity Theft)

The Grand Jury further charges:

4. From at least in or about 2017 up to and including at

least in or about 2020, in the Southern District of New York and elsewhere, LAURELL WELLS and GEORGIA WARD, the defendants, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, during and in relation to the conspiracy to commit wire and bank fraud charged in Count One of this Indictment, WELLS and WARD obtained, transmitted, and used the personally identifying information ("PII") of others in order to utilize those third parties' identities and bank accounts to commit fraud.

(Title 18, United States Code,
Sections 1028A(a)(1), 1028A(b), and 2.)

FORFEITURE ALLEGATIONS

5. As a result of committing the offense alleged in Count One of this Indictment, LAURELL WELLS and GEORGIA WARD, the defendants, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the said offense, including, but not limited to a sum of money in United States

currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

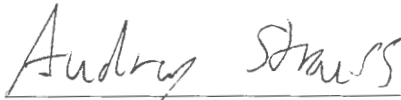
6. If any of the above-described forfeitable property, as a result of any act or omission of LAURELL WELLS and GEORGIA WARD, the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

(Title 18, United States Code, Sections 981 and 982;
Title 21 United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


AUDREY STRAUSS
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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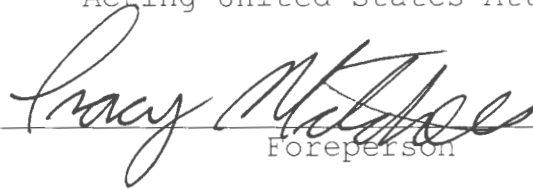
INDICTMENT

20 Cr.

(Title 18, United States Code, Sections
1349, 1028A, and 2.)

AUDREY STRAUSS

Acting United States Attorney


Foreperson
